

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

MARIA ELENA CHAVEZ LETONA,

Plaintiff,

v.

CASE NO.: 23-CV-24299

AMOR DE JESUS CORP., et al.,

Defendants.

_____ /

**DEFENDANTS RESPONSES TO PLAINTIFF'S FIRST REQUEST FOR
PRODUCTION**

COMES NOW, Defendants, by and through undersigned counsel and pursuant to Florida Rule of Civil Procedure 1.350, file these Responses to Plaintiff's First Request for Production as follows:

1. As to request No. 1, if any, will be provided.
2. As to request No. 2, Zelle payments attached.
3. As to request No. 3, if any, will be provided.
4. As to request No. 4, none.
5. As to request No. 5, Zelle payments attached.
6. As to request No. 6, none.
7. As to request No. 7, none.
8. As to request No. 8, none.
9. As to request No. 9, none.
10. As to request No. 10, none.
11. As to request No. 11, none.
12. As to request No. 12, none.

13. As to request No. 13, none.
14. As to request No. 14, none.
15. As to request No. 15, none.
16. As to request No. 16, none.
17. As to request No. 17, none.
18. As to request No. 18, none.
19. As to request No. 19, none.
20. As to request No. 20, none.
21. As to request No. 21, none.
22. As to request No. 22, none.
23. As to request No. 23, none.
24. As to request No. 24, none.
25. As to request No. 25, Zelle payments attached.
26. As to request No. 26, none.
27. As to request No. 27, Zelle payments attached.
28. As to request No. 28, none.
29. As to request No. 29, none.
30. As to request No. 30, none.
31. As to request No. 31, none.
32. As to request No. 32, none.
33. As to request No. 33, none.
34. As to request No. 34, none.
35. As to request No. 35, none.

36. As to request No. 36, none.

37. As to request No. 37, none.

38. As to request No. 38, none.

39. As to request No. 39, none.

40. As to request No. 40, none.

41. As to request No. 41, none.

42. As to request No. 42, none.

43. As to request No. 43, none.

44. As to request No. 44, none.

45. As to request No. 45, none.

46. As to request No. 46, none.

47. As to request No. 47, none.

48. As to request No. 48, none.

49. As to request No. 49, none.

50. As to request No. 50, none.

51. As to request No. 51, none.

52. As to request No. 52, objection, overbroad and not calculated to lead to discoverable evidence.

53. As to request No. 53, none.

54. As to request No. 54, objection, overbroad and not calculated to lead to discoverable evidence.

55. As to request No. 55, none.

56. As to request No. 56, 2020, and 2021 taxes attached.

57. As to request No. 57, 2020, 2021, and 2022 taxes attached.

58. As to request No. 58, none.

59. As to request No. 59, none.

60. As to request No.60, none.

61. As to request No. 61, none.

62. As to request No. 62, license attached.

63. As to request No. 63, license and certificate attached.

64. As to request No. 64, none.

65. As to request No. 65, none.

66. As to request No. 66, license attached.

67. As to request No. 67, license and certificate attached.

68. As to request No. 68, none.

69. As to request No. 69, none.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing pleading has been electronically filed and served via EM/ECF on this 9th day of February 2024.

EMMANUEL PEREZ & ASSOCIATES, P.A.

901 Ponce De Leon Blvd, Suite 101

Coral Gables, FL 33134

Tel. (305)442-7443

eService: courtmail@lawperez.com

By: /s/Emmanuel Perez

EMMANUEL PEREZ

F.B.N. 586552